

IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CASE NO.: 1:23-bk-02615 HWV
Richard Eugene Luckabaugh :
a/k/a Lucky Luckabaugh :
a/k/a Rich Luckabaugh :
Debtor : CHAPTER 13

SECOND MOTION FOR EXTENSION OF TIME TO FILE
SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF
CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST,
PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS, AND CHAPTER 13 PLAN

AND NOW comes Debtor, Richard Eugene Luckabaugh, by and through his attorney, Gary J. Imblum, and respectfully represents:

1. Debtor filed a Chapter 13 Bankruptcy to the above term and number on November 16, 2023.
2. Debtor filed the bankruptcy as an emergency filing due to a pending foreclosure.
3. Debtor filed a First Motion for Extension on November 30, 2023 which was approved by Order dated December 1, 2023.
4. Debtor's schedules are due to the Court on or before January 2, 2024.
5. Counsel is scheduled to meet with Debtor on January 10, 2024 to review and sign his schedules, Means Test, Plan, etc.

6. Debtor's counsel is requesting an additional 15 days in order to file the bankruptcy schedules, plan and other required documents.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order extending the deadline for Debtor to file bankruptcy schedules and plan until January 17, 2024.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.



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Attorney for Debtor

Dated: January 2, 2024

CERTIFICATE OF SERVICE

I, Bernadette A. Davis, Paralegal, hereby certify that I have served a copy of the foregoing
SECOND MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF
SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA,
MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS, AND CHAPTER 13 PLAN
on the following person(s) by E-Service, addressed to:

JACK N. ZAHAROPOULOS ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.

Bernadette Davis

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Dated: January 2, 2024

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ORDER

Upon consideration of Debtor's Second Motion for Extension of Time to File Schedules, Summary of Schedules, Statistical Summary of Certain Liabilities and Related Data, Means Test, Pay Stubs, Statement of Financial Affairs, and Chapter 13 Plan,

IT IS HEREBY ORDERED AND DECREED that the deadline for filing the aforementioned pleadings in the above captioned case is extended through January 17, 2024.